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13 UNITED STATES DISTRICT COURT
14 DISTRICT OF NEVADA

15 JUSTIN L. TRIPP,
16 Plaintiff,
17 vs.
18 CLARK COUNTY, et al
19 Defendants.

20 CASE NO: 2:17-cv-01964-JCM-BNW

21 **STIPULATION AND ORDER TO
22 EXTEND TIME FOR PLAINTIFF TO
23 RESPOND TO NAPHCARE
24 DEFENDANTS' MOTION FOR
25 SUMMARY JUDGMENT (ECF #244)
(Third Request)**

26 COMES NOW, Plaintiff Justin Tripp ("Plaintiff"), by and through his counsel, the law
27 firm of Hatfield & Associates., Ltd., appearing *pro bono publico*, and Defendant NaphCare, Inc.,
28 Defendant Harry Duran, M.D., Defendant Eric Lopez, P.A., Defendant Rachel Scheiblich,
Defendant Kendra Meyer, and Defendant Raymond Mondora, (hereinafter "NaphCare
Defendants"), by and through their counsel, the law firm of Medical Defense Law Group, and
hereby stipulate and agree to extend the time for Plaintiff to Respond to the NaphCare
Defendants' Motion for Summary Judgment [ECF #244], due on November 18, 2022 to
December 2, 2022.

This request is submitted pursuant to LR IA 6-1, 6-2 and 7-1 and is the parties' third
request for an extension of time for Plaintiff to respond to Defendants' Motion for Summary
Judgment.

1 Good cause exists for this extension. Plaintiff is incarcerated in F.C.I. Herlong, in Herlong,
2 California and Plaintiff's Counsel has had difficulty communicating with him. Plaintiff's counsel is
3 requesting an extension of time up to and including December 2, 2022, as Plaintiff requested
4 authority from his incarcerated client to make an offer to resolve this case to Defendants and
5 received that authority and made the offer to Defendants' counsel on October 19, 2022.
6 Defendants responded to the offer on October 25, 2022 with a counteroffer that Plaintiff's
7 counsel needs to convey to Plaintiff.

9 Plaintiff's counsel continues to have difficulty communicating with Plaintiff as F.C.I.
10 Herlong is experiencing a Level 3 Lockdown due to Covid. Inmates are not able to take phone
11 calls or have access to a computer during the lockdown. If Defendants' offer is accepted, the
12 case would then resolve in the entirety whereby the motion may be made moot, but time is
13 needed to convey the counteroffer to Plaintiff.

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1 Defendants have courteously granted this extension of time for Plaintiff to file his
2 Response. Accordingly, Plaintiff shall have up to and including December 2, 2022, to respond
3 to NaphCare Defendants' Motion for Summary Judgment [ECF #244].

4 DATED this 17th day of November, 2022

5 **HATFIELD & ASSOCIATES, LTD.**

6 By: /s/ Trevor J. Hatfield

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11 *Attorney for Plaintiff In Conjunction with
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Bono Project.*

DATED this 17th day of November, 2022

5 **MEDICAL DEFENSE LAW GROUP**

6 By: /s/ Paul A. Cardinale

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5 *Attorneys for NAPHCARE Defendants*

18 **ORDER**

19 **IT IS SO ORDERED:**

20 
21 UNITED STATES DISTRICT COURT JUDGE

22 Dated: November 18, 2022